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9 Attorneys for Defendant
10 AMERICAN EXPRESS NATIONAL BANK

11 UNITED STATES DISTRICT COURT
12 NORTHERN DISTRICT OF CALIFORNIA
13 SAN FRANCISCO DIVISION

14

15 DIANA THEODORE,

Case No.: 3:23-cv-03710

16 Plaintiff,

**STIPULATION FOR EXTENSION OF
TIME TO RESPOND TO COMPLAINT**

17 v.

18 AMERICAN EXPRESS NATIONAL BANK,

Complaint Filed: July 26, 2023

19 Defendant.

20

1 Plaintiff Diana Theodore (“Plaintiff”) and defendant American Express National Bank
2 (“American Express”), through their undersigned counsel, hereby stipulate as follows:

3 WHEREAS, Plaintiff filed the Complaint in this action on July 26, 2023, in the United
4 States District Court for the Northern District of California;

5 WHEREAS, American Express was served with the Complaint on August 2, 2023;

6 WHEREAS, a response by American Express to the Complaint is currently due on or
7 before August 23, 2023;

8 WHEREAS, American Express requires additional time to investigate the allegations in
9 the Complaint;

10 WHEREAS, the Parties, through their respective counsel of record, have agreed to extend
11 American Express’s deadline to respond to the Complaint by thirty (30) days, to and including
12 September 22, 2023;

13 WHEREAS, this Stipulation is made without prejudice to, or waiver of, any rights or
14 defenses otherwise available to the Parties in this action, including without limitation to any
15 challenge to jurisdiction or venue authorized by Federal Rule of Civil Procedure 12(b); and

16 WHEREAS, this change in deadline will not alter the date of any other event or deadline
17 already fixed by Court order, local rules, or the Federal Rules of Civil Procedure.

18 IT IS HEREBY STIPULATED by and between the Parties, through their respective
19 counsel of record, that American Express shall have an additional thirty (30) days, to and
20 including September 22, 2023, to file its response to the Complaint.

21
22 DATED: August 18, 2023

HAGENS BERMAN SOBOL SHAPIRO
LLP

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24 By: /s/ Shayne Stevenson
Shayne Stevenson

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26 Attorneys for Plaintiff
DIANA THEODORE

1 DATED: August 18, 2023

STEPTOE & JOHNSON LLP

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3 By: /s/ Alina Edep
4 Julia B. Strickland
5 David W. Moon
Alina Edep

6 Attorneys for Defendant
7 AMERICAN EXPRESS NATIONAL BANK

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11 **ATTESTATION**

12 In accordance with Civil Local Rule 5-1(h)(3), I, Alina Edep have obtained concurrence
13 in the filing of this document from the other signatory listed here.

14
15 DATED: August 18, 2023

By: /s/ Alina Edep
Alina Edep

CERTIFICATE OF SERVICE

I hereby certify that, on August 18, 2023, copies of the foregoing **STIPULATION FOR EXTENSION OF TIME TO RESPOND TO COMPLAINT** was filed electronically and served by U.S. Mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by facsimile to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

By: _____ /s/ *Alina Edep*
Alina Edep